

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:** § **CHAPTER 11**  
§  
**KRISJENN RANCH, LLC, et al** § **CASE NO. 20-50805-rbk**  
§  
§  
**DEBTOR** § **(Jointly Administered)**

**MOTION REQUESTING EXPEDITED CONSIDERATION OF DEBTORS'  
THIRD JOINT EXPEDITED MOTION TO EXTEND DEBTORS'  
EXCLUSIVITY PERIOD**

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**DEBTOR HAS REQUESTED EXPEDITED CONSIDERATION OF THIS MOTION AND  
HAS REQUESTED THAT A HEARING BE HELD ON THIS MOTION AT THE  
COURT'S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS  
MOTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE  
HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS**  
\*\*\*\*\*

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

KrisJenn Ranch, LLC, KrisJenn Ranch, LLC Series Pipeline ROW, and KrisJenn Ranch, LLC Series Uvalde Ranch's (the "Debtors"), Debtor and Debtors-in-Possession submit this Motion Requesting Expedited Consideration of Debtors' Third Joint Motion to Extend Debtors' Exclusivity Period (the "Motion"), and in support thereof respectfully shows the Court as follows:

**BACKGROUND**

1. Debtors, KrisJenn Ranch, LLC and Series Uvalde Ranch purchased the KrisJenn Ranch (the "Ranch") in 2013 for \$3,952,000 and then invested an additional \$840,000 in the Ranch. The Ranch derives its income from the sale of cattle and a white-tail deer hunting lease operation.

2. The Ranch and a 60 mile pipeline and right of way (the "Pipeline") are encumbered by a \$5.9 million loan from Mcleod Oil ("Mcleod") related to an investment in a pipeline and its

right of way. Longbranch Energy, L.P. (“Longbranch”) and DMA Properties, Inc. have claimed disputed interests in the Pipeline. The issues regarding the pipeline are being litigated in Adversary Number 20-05027, which was set for trial on December 7, 2020. This trial date was continued to January 11, 2021, and after several days of trial, the trial was continued to February 11, 2021, because several members of the Plaintiffs contracted COVID-19. Debtors need to resolve the litigation to determine the terms for their plan of reorganization.

3. Pursuant to this Court’s order on Debtors’ Second Joint Expedited Motion to Extend Debtors’ Exclusivity Period signed November 10, 2020 (Dckt No. 90), Debtors’ exclusivity period is set to terminate by operation of law on February 11, 2021. After notice and hearing, this Court has the inherent authority to extend the 120-day period. *See* 11 U.S.C. 1121(d). Debtors, in the underlying motion, are requesting the court extend exclusivity for filing their plans until April 12, 2021, and to solicit and confirm their plan until June 28, 2021.

**RELIEF REQUESTED**

4. Debtors request the court set an expedited hearing on Debtors’ Third Joint Motion to Extend Debtors’ Exclusivity Period.

**PRAYER**

WHEREFORE, premises considered, Debtors respectfully request that the Court grant this request and set the Third Joint Motion to Extend Debtors’ Exclusivity Period to be heard at the Court’s earliest convenience.

Dated: January 28, 2021

Respectfully submitted,

Submitted By:  
SMEBERG LAW FIRM, PLLC

By: /s/ Ronald J. Smeberg  
RONALD J. SMEBERG  
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ATTORNEY FOR DEBTOR

**CERTIFICATE OF CONFERENCE**

I hereby certify that on January 27, 2021 I conferreded via electronic mail with the United States Trustee and bankruptcy counsel for Mcleod Oil, Longbranch, and DMA via email. Counsel for DMA and Longbranch are unopposed and the other counsels have not yet taken a position on the motion.

/s/ Ronald J. Smeberg  
RONALD J. SMEBERG

**CERTIFICATE OF SERVICE**

I hereby certify that on January 28, 2021, true and correct copies of the foregoing will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg  
RONALD J. SMEBERG

## SERVICE LIST

### **DEBTOR**

KrissJenn Ranch, LLC  
410 Spyglass Rd  
Mc Queeney, TX 78123-3418

### **GOVERNMENT ENTITIES**

Office of the UST  
615 E Houston, Room 533  
PO Box 1539  
San Antonio, TX 78295-1539

U.S. Attorney  
Attn: Bkcy Division  
601 NW Loop 410, Suite 600  
San Antonio, Texas 78216

Internal Revenue Services  
Special Procedures Branch  
300 E. 8<sup>th</sup> St. STOP 5026 AUS  
Austin, TX 78701

Texas Comptroller of Public Account  
Attn: Bankruptcy  
P.O. Box 149359  
Austin, TX 78714-9359

Angelina County Tax Assessor  
606 E Lufkin Ave,  
Lufkin, Texas 75901

Nacogdoches County Tax  
Assessor Collector  
101 West Main Street  
Nacogdoches, Texas 75961

Rusk County  
202 N Main St,  
Henderson, Texas 75652

Shelby County, Tax Collector  
200 St. Augustine St.  
Center, Texas 75935

Tenaha ISD Tax Assessor-Collector  
138 College St  
Tenaha, TX 75974-5612

Uvalde Tax Assessor  
Courthouse Plaza, Box 8  
Uvalde, Texas 78801

### **NOTICE PARTIES**

METTAUER LAW FIRM  
c/o April Prince  
403 Nacogdoches St Ste 1  
Center, TX 75935-3810

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ste 400A  
Austin, Texas 78737

Timothy Cleveland  
CLEVELAND|TERRAZAS PLLC  
4611 Bee Cave Road, ste 306B  
Austin, Texas 78746

### **SECURED CREDITORS**

McLeod Oil, LLC  
c/o John W. McLeod, Jr.  
700 N Wildwood Dr  
Irving, TX 75061-8832

### **UNSECURED CREDITORS**

Bigfoot Energy Services  
312 W Sabine St  
Carthage, TX 75633-2519

C&W Fuels, Inc.  
Po Box 40  
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza  
755 E Mulberry Ave Ste 500  
San Antonio, TX 78212-3135

Granstaff Gaedke & Edgmon

5535 Fredericksburg Rd Ste 110  
San Antonio, TX 78229-3553

Hopper's Soft Water Service  
120 W Frio St  
Uvalde, TX 78801-3602

Larry Wright  
410 Spyglass Rd  
Mc Queeney, TX 78123-3418

Medina Electric  
2308 18th St.  
Po Box 370  
Hondo, TX 78861-0370

Medina's Pest Control  
1490 S Homestead Rd  
Uvalde, TX 78801-7625

Texas Farm Store  
236 E Nopal St  
Uvalde, TX 78801-5317

Uvalco Supply  
2521 E Main St  
Uvalde, TX 78801-4940

Longbranch Energy  
c/o DUKE BANISTER RICHMOND  
Po Box 175  
Fulshear, TX 77441-0175

DMA Properties, Inc.  
896 Walnut Street at US 123 BYP  
Seneca, SC 29678